

United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604



April 26, 2007

Mr. Keith Wilcoxson
SECOR International Incorporated
446 Eisenhower Lane North
Lombard, Illinois 60148

Re: Southeast Rockford Groundwater Contamination Site
Area 9/10 – SVE/Air Sparge – OSA Final Design Package
Approval with Conditions Noted Below

Dear Mr. Wilcoxson:

The United States Environmental Protection Agency (U.S. EPA) is in receipt of a five-volume set of documents comprising the remedial design for Area 9/10 of the Southeast Rockford Groundwater Contamination site. U.S. EPA has conferred with the Illinois Environmental Protection Agency (IL EPA) in reviewing these documents. The volumes include the 100% Final Design, Technical Specifications, an Operation, Maintenance and Monitoring Plan, a Construction Quality Assurance Project Plan, and amendments and updates to the Area 9/10 Health and Safety Plan.

Upon review, U.S. EPA indicates overall final design plan approval. However, such approval is subject to certain conditions and clarifications as noted below:

1. Well Construction Details – U.S. EPA notes that drawing Y6 provides construction details for air sparge and soil vapor extraction wells. At the time of work plan preparation to guide the remedial design work, U.S. EPA noted that Part 920 of the Illinois Water Well Construction Code should govern installation of any groundwater monitoring wells. In the establishment of the Area 9/10 monitoring network as discussed in the Final Design, monitoring wells GMZ-1 through GMZ-4 would appear to constitute new construction. Hence, a potential construction contractor should be aware of details governing installation of monitoring wells, as drawing Y6 provides such details for the intended extraction wells. U.S. EPA believes reference should once again be made to Part 920 as noted above.
2. Concerning final system shutdown upon attainment of remedial goals, as discussed in the Operation, Maintenance and Monitoring Plan, the appropriate

wording in Section 5.10 of that plan should speak of “agencies approval” as opposed to “consultation”.

3. U.S. EPA understands and appreciates that fact that the proposed “pulsed” basis of operation period for air sparging and soil vapor extraction will help conserve energy usage. U.S. EPA also understands that design anticipates operations flexibility such that pulsing time may be adjusted pending operational experience gained. U.S. EPA advises as a condition of approval that should flow rates through the groundwater management zone be sufficiently great, operational experience could show a need to lengthen pulsing times and periods of operation.
4. U.S. EPA notes that existing monitoring wells SMW-4 and SMW-5 could from time to time be a useful supplement to proposed wells GMZ-1 and GMZ-2 in evaluating GMZ conditions.
5. U.S. EPA notes that a correction in Table 5.2 of soil boring data for SMW-16 and SMW-17 may have been pending from the 95% pre-design. Was such correction included in the final design? If not, please submit at your earliest opportunity.

U.S. EPA looks forward to subsequent discussions and negotiations concerning the construction and operation of the systems discussed in the design package.

Yours truly,



Russell D. Hart, RPM

cc:

T. Williams, IL EPA

S. Moyer, HS/UTC

T. Turner, ORC